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10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
12 **SAN JOSE DIVISION**

13 UNITED STATES OF AMERICA,

Case No. CR. 15-00427 BLF

14 Plaintiff,

15 v.

16 RAGINI VECHAM et al.,

17 Defendants.

**STIPULATION AND [PROPOSED]
ORDER TO CONTINUE STATUS
CONFERENCE FROM NOVEMBER 3,
2015 TO DECEMBER 8, 2015**

20 **STIPULATION AND [PROPOSED] ORDER**

21 The United States of America, by and through Assistant United States Timothy Lucey,
22 Ragini Vecham, by and through her counsel Nanci Clarence, Kishore Pallapothu, by and through
23 his counsel of record Mary McNamara, Satyanarayana Tota, by and through his counsel of
24 record Ethan Balogh, and Ramana Reddy, by and through his counsel of record Ismail Ramsay,
25 together respectfully request that the Court continue the status conference currently set for
26 November 3, 2015 to December 8, 2015 at 9:00 a.m., for the following reasons:

1. The United States recently produced to defense counsel an external hard drive
2 containing a large amount of documents and data representing the discovery in this case;

3. Defense counsel is reviewing and will be continuing to review and evaluate
4 discovery already provided by the Government in this matter relative to preparing for the status
5 hearing and setting further dates before the Court. Defense counsel, therefore, desire additional
6 time to review the discovery and current charges, consult with their clients, conduct research and
7 investigation, and otherwise prepare and evaluate the case.

8. In light of the foregoing, counsel for the parties jointly agree and stipulate that a
9 continuance of this matter is appropriate and that based on their respective calendars and the
10 period needed to evaluate the aforementioned discovery matters, an appropriate date for a status
11 hearing is December 8, 2015.

12. The parties, therefore, jointly request that the Court issue an order continuing the
13 status conference from November 3, 2015 to December 8, 2015.

14. The parties further agree that excluding time until December 8, 2015 is
15 appropriate in order to provide reasonable time necessary for effective preparation of counsel,
16 taking into account the exercise of due diligence. See 18 U.S.C. § 3161(h)(7). Finally, the
17 parties agree that the ends of justice served by excluding time from November 3, 2015, up to and
18 including until December 8, 2015, outweigh the best interest of the public and the defendant in a
19 speedy.

20 **IT IS SO STIPULATED**

21 Respectfully submitted,

22 Dated: October 30, 2015

23 /s/
24 TIMOTHY J. LUCEY
25 Assistant United States Attorney

1 Dated: October 30, 2015

2 /s/
3 EDWIN PRATHER/MARY McNAMARA
4 Attorney for Kishore Pallapothu

5 Dated: October 30, 2015

6 /s/
7 NANCI CLARENCE
8 Attorney for Ragini Vecham

9 Dated: October 30, 2015

10 /s/
11 ISMAIL RAMSEY
12 Attorney for Ramana Reddy

13 Dated: October 30, 2015

14 /s/
15 ETHAN A. BALOGH
16 Attorney for Satyanarayana Tota

17 **IT IS SO ORDERED.**

18 DATED: _____

19 HON. BETH L. FREEMAN
20 United States District Court